

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,

Plaintiff,

v.

GLENN BECK; THE BLAZE, INC.;  
MERCURY RADIO ARTS, INC.; AND  
PREMIERE RADIO NETWORKS, INC.,

Defendants.

CIVIL ACTION NO.  
1:14-cv-11550-PBS

**DEEFNDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56(c) of the Federal Rules of Civil Procedure and Local Rule 56.1, Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as "The Blaze, Inc."), Mercury Radio Arts, Inc., and Premiere Networks, Inc. f/k/a Premiere Radio Networks, Inc. (collectively, "Defendants") hereby move for entry of summary judgment on all counts of the Amended Complaint. In further support of their motion, Defendants respectfully refer the Court to the following materials which are filed simultaneously herewith and incorporated herein by reference:

1. Memorandum of Law in Support of Defendants' Motion for Summary Judgment;
2. Defendants' Statement of Undisputed Material Facts in Support of Motion for Summary Judgment;
3. Declaration of Counsel in Support of Defendants' Motion for Summary Judgment;
4. Declaration of Glenn Beck in Support of Defendants' Motion for Summary Judgment;
5. Declaration of Joel Cheatwood in Support of Defendants' Motion for Summary Judgment;

6. Declaration of George ("Joe") E. Weasel, III in Support of Defendants' Motion for Summary Judgment;
7. Declaration of Misty Kawecky in Support of Defendants' Motion for Summary Judgment;
8. Declaration of Alan Korowitz in Support of Defendants' Motion for Summary Judgment;
9. Declaration of Julie Talbott in Support of Defendants' Motion for Summary Judgment;
10. Declaration of Michael V. Howard in Support of Defendants' Motion for Summary Judgment; and
11. Declaration of Richard J. Egan in Support of Defendants' Motion for Summary Judgment.

**WHEREFORE**, Defendants respectfully request that the Court enter summary judgment in their favor on all counts of the Amended Complaint.

Respectfully submitted,

Counsel for Defendants,

/s/ Zachary C. Kleinsasser

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Dated: May 31, 2016

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Defendants respectfully request oral argument on this motion.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), counsel for Defendants and counsel for Plaintiff have conferred in good faith and have been unable to resolve or narrow the issues presented herein.

/s/ Zachary C. Kleinsasser

**CERTIFICATE OF SERVICE**

I, Zachary C. Kleinsasser, hereby certify that on May 31, 2016, this document was served upon counsel to Plaintiff in this action.

/s/ Zachary C. Kleinsasser